

EXHIBIT A

From: [Hur, Benedict Y.](#)
To: [Jenna Farleigh](#); [Santacana, Eduardo E.](#); [Amanda Bonn](#); [Alex Frawley](#); [Amy Gregory](#); [Bill Carmody](#); [brichardson](#); [Erika Nyborg-Burch](#); ['jlee@bsfllp.com'](#); [Mark C. Mao](#); ['rbaeza@bsfllp.com'](#); [Michael Ram x20021](#); [rmcgee](#)
Cc: [Agnolucci, Simona](#); [Arakaki, Lori](#); [Flórez, Argemira](#); [Peifer, Celeste](#)
Subject: RE: Rodriguez v. Google | Plaintiffs' Full Proposed Schedule
Date: Friday, October 29, 2021 7:06:55 PM

EXTERNAL Email

Jenna – as a compromise, Google would be willing to push back the expert discovery and future dependent deadlines by a couple of months. As I believe Eduardo has mentioned, we are also willing to provide a short courtesy extension of the fact discovery deadline. Let us know if you are interested and if that would obviate motion practice.

Thanks,
 Ben

Benedict Y. Hur

Willkie Farr & Gallagher LLP

One Front Street | San Francisco, CA 94111
 Direct: [+1 415 858 7401](tel:+14158587401) | Fax: +1 415 858 7599
bhur@willkie.com | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

From: Jenna Farleigh <JFarleigh@susmangodfrey.com>
Sent: Friday, October 29, 2021 11:31 AM
To: Santacana, Eduardo E. <ESantacana@willkie.com>; Amanda Bonn <abonn@SusmanGodfrey.com>; Alex Frawley <AFrawley@susmangodfrey.com>; Amy Gregory <AGregory@susmangodfrey.com>; Bill Carmody <bcarmody@SusmanGodfrey.com>; brichardson <brichardson@bsfllp.com>; Erika Nyborg-Burch <enyborg-burch@bsfllp.com>; 'jlee@bsfllp.com' <jlee@bsfllp.com>; Mark C. Mao <mmao@bsfllp.com>; 'rbaeza@bsfllp.com' <rbaeza@bsfllp.com>; Michael Ram x20021 <MRam@forthepeople.com>; rmcgee <rmcgee@forthepeople.com>
Cc: Agnolucci, Simona <SAgnolucci@willkie.com>; Hur, Benedict Y. <BHur@willkie.com>; Arakaki, Lori <LAarakaki@willkie.com>; Flórez, Argemira <AFlorez@willkie.com>; Peifer, Celeste <CPeifer@willkie.com>
Subject: Rodriguez v. Google | Plaintiffs' Full Proposed Schedule

***** EXTERNAL EMAIL *****

Eduardo,

As you now, we are making a motion today to extend the Case Management Schedule. As part of that, we are also seeking clarity on the remainder of the schedule. Since Google won't agree to the initial extensions, we assume it also won't agree to the fuller scheduling picture. Our full proposed schedule is below for your records.

Action	Scheduling Order	Court Ordered	Proposed Deadline
--------	------------------	---------------	-------------------

	Deadline (Dkt. 47)	Modification (Dkt. 125)	
Fact Discovery	N/A	January 11, 2022	July 13, 2022
Expert Disclosure / Opening Report Date	December 13, 2021	January 11, 2022	July 13, 2022
Plaintiffs' Motion for Class Certification	January 14, 2022	N/A	August 24, 2022
Responsive Expert Report Deadlines	February 14, 2022	N/A	August 26, 2022
Google's Opposition to Motion for Class Certification	March 14, 2022	N/A	September 28, 2022
Rebuttal Expert Report Deadline	April 14, 2022	N/A	October 28, 2022
Plaintiffs' Reply In Support of Motion for Class Certification	April 28, 2022	N/A	November 11, 2022
Close of Expert Discovery	May 13, 2022	N/A	December 16, 2022
Last Day to File Dispositive Motions and <i>Daubert</i> Motions	July 15, 2022	N/A	February 10, 2023
Summary Judgment and <i>Daubert</i> Oppositions	August 12, 2022	N/A	March 10, 2023
Summary Judgment and <i>Daubert</i> Replies	September 9, 2022	N/A	March 31, 2023

Regards,

Jenna

Jenna G. Farleigh | Susman Godfrey L.L.P.
 1201 Third Avenue | Suite 3800 | Seattle, WA 98101
 Phone: (206) 505-3826
 HOUSTON • LOS ANGELES • SEATTLE • NEW YORK

jfarleigh@susmangodfrey.com | www.susmangodfrey.com

This message may be protected by the attorney client privilege or the work product doctrine.

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.